

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

IN THE MATTER OF THE SEARCH OF:

Case No: 1:17-mj-69

USPS Mail Parcel identified

by tracking # 13130040000038724912

addressed to:

T. BAILEY

711 GILLESPIE RD

CHATTANOOGA, TN 37411

AFFIDAVIT

I, Jedidiah Hutchison, being duly sworn, hereby depose and say:

1. I am a Postal Inspector with the United States Postal Inspection Service. I have been employed in this capacity since 2010. I am currently assigned to the United States Postal Inspection Service Office in Chattanooga, Tennessee. I am responsible for investigating crimes involving the United States Postal Service ("USPS"), its employees, and its customers. These crimes include but are not limited to employee assaults, mail fraud, mail theft, identity theft, and prohibited mailings including child pornography and illegal narcotics.

2. I am a Law Enforcement Officer under the authority of Title 18, United States Code, Section 3061. As such, I am authorized to make arrests without warrant for offenses made in my presence or when I have reasonable grounds to believe the person has committed or is committing a felony against the United States. I am also authorized under this statute to carry firearms and make seizures of property as provided by law.

3. From my training and experience, I know that the United States Postal Service is frequently used to transport illegal narcotics to areas throughout the United States. I am also aware that the United States Postal Service is frequently used to send the proceeds relating to narcotics distribution back to the narcotics source of supply. I also know that the reason drug

traffickers use the United States Mail to ship controlled substances and their proceeds is because of the speed and protection afforded the United States Mail.

4. Title 21, United States Code, Section 841 makes it an offense for any person to manufacture, distribute, or possess with intent to manufacture or distribute, a controlled substance. Title 21, United States Code, Section 843(b) makes it an offense for any person knowingly or intentionally to use any communication facility in committing or in causing to facilitate the commission of any act or acts constituting a felony under any provisions of Subchapter I or Subchapter II of the Drug Abuse Prevention and Control Act. Title 21, United States Code, Section 846 makes it an offense to conspire to commit an offense set out in Title 21. Under Title 18 United States Code, Section 1342 makes it illegal to receive mail matter or packages addressed to fictitious names while carrying on unlawful business.

5. To combat the distribution of illegal narcotics and their proceeds, certain investigative techniques are utilized by Postal Inspectors. What follows is not meant to set forth all exhaustive investigative knowledge of this case or investigative techniques used, but only those facts necessary in order to establish probable cause.

RELEVANT FACTS

6. In or about December 2016, the United States Postal Inspection Service, in conjunction with other federal agencies, began investigating a California-based Drug Trafficking Organization (“DTO”) that appeared to be using the United States Mail to transport controlled substances across state lines.

7. On April 4, 2017, I became suspicious of a USPS Mail parcel (hereinafter “the package” or “the parcel”) bearing the unique USPS Tracking number 13130040000038724912 and addressed as follows:

FROM:

**JAY CARSON
18488 MONTEZUMA ST.
ADELANTO, CA 92301**

TO:

**T. BAILEY
711 GILLESPIE RD
CHATTANOOGA, TN 37411**

8. I have identified multiple prior parcels mailed in in the last few months coming from this area of California going to 711 Gillespie Rd in Chattanooga. This area of California is an area known to supply illegal narcotics to various destinations within the United States.

9. On December 21, 2016, an individual was seen via CCTV in the Adelanto California Post Office mailing two packages. One of those packages was destined for 711 Gillespie Rd in Chattanooga. The other package, mailed at the same time, was destined for 126 W 83rd St., Apt 5R, in New York City. On January 31, 2017, this same individual was seen mailing another package to the same address in New York City: 126 W 83rd Street Apt 5R. That package was marked with the assumed name of "L Gonzalez" on the return address. After obtaining a federal search warrant on this package, agents discovered just over five kilograms of a substance that tested presumptively positive for cocaine.

10. This same mailer has been seen in multiple other Post Offices around California using assumed and/or fictitious names mailing packages to various destinations within the United States. At least three other packages have been mailed from this individual to other destinations and subsequently intercepted by law enforcement. Searches of those intercepted packages revealed that each contained approximately five kilograms of suspected cocaine.

11. Further investigation revealed the sender of most of these packages to be Jonathan Carey. In addition to Gillespie Road in Chattanooga, Carey has been seen on video mailing multiple packages to 1214 Belmeade Avenue in Chattanooga, which bore the presumably

fictitious names “Dave Carson” and “J. Thomas” in the return address. On 12/27/2016, a package was mailed from Chattanooga using the return address “1214 Belmeade Ave.” That package was addressed to “J Carey” in Victorville, CA. After obtaining a federal search warrant, agents in California examined the package and discovered approximately \$200,000 in bulk US Currency.

12. On April 4, 2017, I met with K-9 Drug Detector Dog Unit Officer Shane Rominger and his K-9 “Red”. K-9 Red conducted an exterior examinations of the above parcel along with three (3) other parcels of similar size and weight. I was present when the parcels were presented to K-9 Red by his handler, Officer Rominger. Officer Rominger informed me that K-9 Red demonstrated a positive alert on the package bearing the above address.

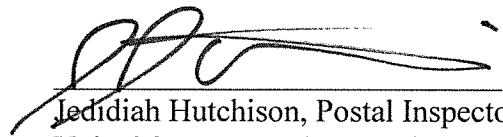
13. I have been advised of the qualifications of the K-9 handler and his narcotics detector canine. K-9 Red is trained to detect the odor of illegal narcotics including marijuana, cocaine, heroin, and methamphetamine. K-9 Red and Officer Rominger are certified by qualified trainers with the Hamilton County Sheriff’s Office as a K-9 drug detection team. Since 2014, K-9 Red and Officer Rominger have completed weekly training sessions, including K-9 drug detection techniques, handling and handler-dog communication. Additionally, K-9 Red and Officer Rominger engage in a minimum of 16 hours per month of training in drug detection techniques, handling, and handler-dog communication. K-9 Red has been in service for approximately five years, during which time, he has proven reliable in detecting narcotics odor, including the odor of marijuana, cocaine, heroin, and methamphetamine.

14. Based on the facts set forth in this affidavit, I believe there is probable cause to believe that the above-described parcel – bearing tracking number 13130040000038724912, addressed to T. Bailey – contains controlled substances, currency, paraphernalia, or other

evidence that relates to trafficking of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 843(b) (unlawful use of a communication facility, including the U.S. Mails, to facilitate the distribution of a controlled substance) and 846 (offense to conspire to commit an offense set out in Title 21).

15. The subject parcel has been maintained unopened in my custody pending application for a search warrant.

FURTHER AFFIANT SAYETH NAUGHT.


Jedidiah Hutchison, Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me this 4th day of April, 2017.


HONORABLE CHRISTOPHER H. STEGER
UNITED STATES MAGISTRATE JUDGE